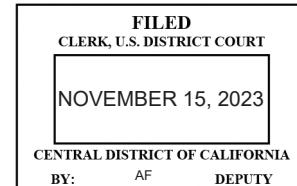


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UNITED STATES OF AMERICA



10
11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

CR 2:23-cr-00564-MWF

14 Plaintiff,

GOVERNMENT'S EX PARTE APPLICATION
FOR ORDER SEALING INDICTMENT AND
RELATED DOCUMENTS; DECLARATION OF
MIRI SONG

15 v.

16 ERICK OVED ESTRADA, ET AL.,

(UNDER SEAL)

17 Defendants.

18
19 The government hereby applies ex parte for an order that the
20 indictment and any related documents in the above-titled case (except
21 the arrest warrants for the charged defendants) be kept under seal
22 until the government files a "Report Commencing Criminal Action" in
23 this matter.

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28 //

This ex parte application is made pursuant to Federal Rule of Criminal Procedure 6(e)(4) and is based on the attached declaration of MiRi Song.

Dated: November 14, 2023

Respectfully submitted,

E. MARTIN ESTRADA
United States Attorney

MACK E. JENKINS
Assistant United States Attorney
Chief, Criminal Division

MIRI SONG
Assistant United States Attorney

Attorneys for Plaintiff
UNITED STATES OF AMERICA

DECLARATION OF MIRI SONG

I, MiRi Song, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I represent the government in the prosecution of United States v. ERICK OVED ESTRADA, ET AL., the indictment in which is being presented to a federal grand jury in the Central District of California on November 15, 2023.

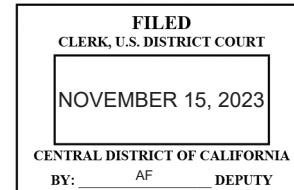
2. The defendants charged in the above-captioned indictment have not been taken into custody on the charges contained in the indictment and have not been informed that they are being named as defendants in the indictment to be presented to the grand jury on November 15, 2023. The likelihood of apprehending one or more of the charged defendants might jeopardized if the indictment in this case were made publicly available before defendants are taken into custody on the indictment.

3. Accordingly, the government requests that the indictment and sealed documents in this case (except the arrest warrants) be sealed and remain so until one of the defendants is taken into custody on the charges contained in the indictment and the government files a "Report Commencing Criminal Action" in this matter.

4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Los Angeles, California, on November 14, 2023.

MIRI SONG

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2 United States Attorney
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9 Attorneys for Plaintiff
UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

CR

14 Plaintiff,

[PROPOSED] ORDER SEALING
INDICTMENT AND RELATED DOCUMENTS

15 v.

(UNDER SEAL)

16 ERICK OVED ESTRADA, ET AL.,

17 Defendants.

18
19 For good cause shown, IT IS HEREBY ORDERED THAT:

20 Pursuant to Federal Rule of Criminal Procedure 6(e)(4), the
21 indictment and any related documents in the above-titled case (except
22 the arrest warrants), the government's sealing application, and this
23 order shall be kept under seal until such time as the government
24 files a "Report Commencing Criminal Action" in this matter.

25
26 November 15, 20263
27 DATE

/ s / Sagar
HONORABLE ALKA SAGAR
UNITED STATES MAGISTRATE JUDGE

1 **OR IN CASE OF DENIAL:**

2 The government's application for sealed filing is DENIED. The
3 sealing application will be filed under seal. The underlying
4 document(s) shall be returned to the government, without filing of
5 the documents or reflection of the name or nature of the documents on
6 the clerk's public docket.

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9 DATE

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HONORABLE ALKA SAGAR
UNITED STATES MAGISTRATE JUDGE